

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

MICHAEL OAKES,

Plaintiff,

v.

JUST ONE DIME, LLC; JUST ONE DIME
COACHING, LLC d/b/a DONE FOR YOU
BY JUST ONE DIME; VERITUS TEXAS
ONE, LLC, f/k/a VERITUS A SERIES OF
EMBUE, LLC; ACTONICUS TEXAS ONE,
LLC, f/k/a ACTONICUS A SERIES OF
EMBUE, LLC; JOSIAH KNIEP;
KIMBERLY KNIEP; DANILO
VARRIALE; and TRAVIS S. KNIEP,

Defendants.

Civil Action No. 1:22-CV-01045-LY

**DEFENDANTS JUST ONE DIME COACHING, LLC
AND TRAVIS S. KNIEP'S ANSWER**

COMES NOW, Defendants Just One Dime Coaching, LLC and Travis S. Kniep ("Defendants"), and file this Answer, General Denial, and Affirmative Defenses in response to Plaintiff's Original Petition. Defendants show the Court as follows:

I. General Denial

1. Defendants deny all of the allegations in the complaint as authorized by Federal Rule of Civil Procedure 8(b)(3).

II. Affirmative Defenses

2. Defendants assert the following affirmative defenses to the claims filed by Plaintiff:
 - a. Plaintiff's claims are barred because Plaintiff agreed to arbitrate.

- b. Plaintiff's claims are barred because Plaintiff fails to state a claim upon which relief may be granted.
 - c. Plaintiff's claims are barred because Plaintiff has unclean hands.
3. Defendants reserve the right to amend this answer and assert additional defenses as the facts of this case warrant.

III. Prayer

For these reasons, Defendants pray that Plaintiff take nothing by this suit, that all relief requested by Plaintiff be denied, and award all other relief to which Defendants are entitled to at law or in equity.

Respectfully submitted,

Dated: November 15, 2022

SUSMAN GODFREY L.L.P.

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Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served on all counsel of record by method indicated below on the 15th day of November 2022 in accordance with the Texas Rules of Civil Procedure.

via email
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/s/ J. Hoke Peacock III

J. Hoke Peacock III
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